

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHOENIX BULK CARRIERS (BVI), LTD,

Petitioner,

V.

TRIORIENT, LLC

Respondent

Civil Action No
1:20-CV-00936-JGK

**NOTICE OF JOINT MOTION
TO QUASH SUBPOENAS**

PLEASE TAKE NOTICE that upon the affirmation of James M. Moriarty dated December 2, 2020 and the accompanying Memorandum of Law in Support of Joint Motion to Quash, non-parties Albert Winslow and Juan Facundo Santucci (collectively, the “Non-Parties”) will move this Court, pursuant to Fed. R. Civ. P. 45(d)(3), at Courtroom 21A, United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be established by this Court (if it directs oral argument to be had), or at the conclusion of the submission of motion papers, for an Order quashing the subpoenas served on Brooklawn Country Club, seeking private financial records and other personal documents related to Mr. Winslow, and Manursing Island Club, seeking private financial records and other personal documents related to Mr. Santucci, (collectively the “Country Clubs”), by Phoenix Bulk Carriers (BVI) Ltd.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(a), opposing papers are required to be served within seven (7) days after service of the moving papers, and reply papers are required to be served within two (2) days after service of the answering papers.

Dated: Bridgeport, Connecticut
December 2, 2020

ZEISLER & ZEISLER, P.C.
Attorneys for Non-Party Movants

By: James M. Moriarty
James M. Moriarty (JM6959)
Zeisler & Zeisler, P.C.
10 Middle Street, 15th Floor
Bridgeport, CT 06604
Telephone: 203-368-4234
Facsimile: 203-549-0903
Email: jmoriarty@zeislaw.com

TO: Peter J. Gutowski, Esq.
Attorneys for Petitioner
Phoenix Bulk Carriers (BVI)
Ltd.
Freehill, Morgan & Mahar LLP
80 Pine Street
New York, New York 10005
Via ECF